



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave  
Washington, DC 20591

**SEP 20 2019**

Exemption No. 18337  
Regulatory Docket No. FAA-2008-1352

Mr. Richard L. Naves  
Training Director  
Toledo City School District d.b.a. Aerospace Center  
11791 West Airport Service Road  
Swanton, OH 43558

Dear Mr. Naves:

This letter is to inform you that we have granted your request for exemption. It transmits our decision, explains its basis, and gives you the conditions and limitations of the exemption, including the date it ends.

#### **The Basis for Our Decision**

By letter dated July 31, 2019, you petitioned the Federal Aviation Administration (FAA) on behalf of the Toledo City School District d.b.a Aerospace Center (Aerospace) for an exemption from § 65.75(a) of Title 14, Code of Federal Regulations (14 CFR) to the extent necessary to allow Aerospace to administer the Aviation Mechanic General (AMG) written test to students immediately following successful completion of the general curriculum, prior to meeting the experience requirements of 14 CFR § 65.77.

In your petition, you indicate that there has been no change in the conditions and reasons relative to public interest and safety that were the basis for granting the original exemption.

Although you requested an extension of Exemption No.11497A (copy enclosed), that exemption expired on May 30, 2019. Therefore, we are issuing Aerospace a new exemption.

AFS-19-129205-E

## **Our Decision**

The FAA has determined that good cause exists for not publishing a summary of the petition in the Federal Register because the requested exemption would not set a precedent, and any delay in acting on this petition would be detrimental to Aerospace.

Beginning July 2015, the FAA required the use of operation specifications (OpSpecs) for Aviation Maintenance Technician Schools (AMTS) as published in FAA Notice 8900.278 on November 21, 2014. OpSpec A005 is intended to identify if the AMTS is operating under the provision of an exemption. New Condition and Limitation No. 4 addresses this requirement. An AMTS certificated under 14 CFR part 147 is authorized the use of OpSpecs as stated in § 147.5(b).

Under the authority provided by 49 U.S.C. §§ 106(f), 40113, and 44701, which the FAA Administrator has delegated to me, I grant Toledo City School District d/b/a Aerospace Center (Aerospace) an exemption from 14 CFR § 65.75(a) to allow Aerospace to administer the Aviation Mechanic General (AMG) written test to students immediately following successful completion of the general curriculum, prior to meeting the experience requirements of 14 CFR § 65.77, subject to the conditions and limitations listed below.

## **Conditions and Limitations**

1. Aerospace must develop written procedures for administering the AMG written test to Aerospace aviation students immediately following successful completion of the general curriculum.
2. Aerospace must ensure these procedures are available for use in its approved operating or curriculum procedures document or manual, as applicable.
3. Before retesting a student who has failed the AMG examination and also does not meet the experience requirements of 14 CFR § 65.77, Aerospace must require the student to repeat each instructional item associated with the failed test and receive authorization from Aerospace to retake the test. Aerospace must have procedures for documenting and tracking compliance with all retesting procedures.
4. In order for Aerospace to conduct operations under this exemption, Aerospace or its Principal Inspector must enter the CFR number § 65.75(a), Aerospace's exemption number, and the date of expiration into Aerospace's OpSpec A005.
5. Before exercising the privileges of this exemption, Aerospace must provide the written procedures for administering the AMG written test to its Certificate Holding District Office (CHDO) for review and approval.

This exemption terminates on September 30, 2021, unless sooner superseded or rescinded.

Sincerely,

A handwritten signature in black ink, appearing to read "R. C. Carty". The signature is fluid and cursive, with the first and last names being more prominent than the middle initial.

**Robert C. Carty**  
**Deputy Executive Director,**  
**Flight Standards Service**

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